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July 18, 2024

BY ECF

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records v. United States Citizenship and Immigration Services*, No. 23 Civ. 1997 (PAE)

Your Honor:

I am Of Counsel to Beldock Levine & Hoffman LLP, representing Plaintiffs in the above-referenced action brought pursuant to the Freedom of Information Act ("FOIA"). I am writing in response to the Court's June 20, 2024 annotation to the proposed briefing schedule (Docket Number 35), and specifically to confirm Plaintiffs' understanding that agreement to the proposed schedule waives the right to amend the complaint once as a matter of course.

Additionally, I wish to apologize for and explain Plaintiffs' delay in responding to the Court's annotation. At the time of the Court's June 20, 2024 filing, I was dealing with unanticipated medical issues which culminated in my hospitalization from June 24 through July 1, 2024 and recuperation following my discharge, and am only now returning to my earlier capacities in this matter. I believe I have now recovered from my illness, but should the need for any extensions arise due to further medical issues, I will seek to obtain advance consent from opposing counsel and the Court.

I thank the Court for its attention to this matter and for its understanding.

BELDOCK LEVINE & HOFFMAN LLP

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Respectfully submitted,

/s/ Benjamin Meyers

Benjamin Meyers

cc: Defendant's counsel (by ECF)